

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PHOENIX REO, LLC, as assignee of Phoenix)	
NPL, LLC, assignee of the Federal Deposit)	
Insurance Corporation, as Receiver for The)	
National Republic Bank of Chicago,)	
Plaintiff,)	Case No. 14 CV 08669
v.)	
)	5940 N. Sacramento
ALBERT BABA, an individual, MARGRIT)	Chicago, IL 60659
BABA, an individual, NELLA BABA, an)	
individual, UNKNOWN OWNERS and)	Honorable Robert M. Dow, Jr.
NONRECORD CLAIMANTS,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR
ENTRY OF JUDGMENT OF FORECLOSURE AND SALE**

PHOENIX REO, LLC, as assignee of Phoenix NPL, LLC, assignee of the Federal Deposit Insurance Corporation, as Receiver for The National Republic Bank of Chicago ("Plaintiff"), by and through its attorney, Sandra A. Franco of Arnstein & Lehr LLP, moves pursuant to Section 735 ILCS 5/15-1506 of the Illinois Mortgage Foreclosure Law for the entry of a Judgment of Foreclosure and Sale in its favor and against Albert Baba, Margrit Baba, Nella Baba, Unknown Owners and Nonrecord Claimants and in support thereof, states as follows:

1. Plaintiff filed its Complaint for Mortgage Foreclosure and Other Equitable Relief (the "Complaint") on October 15, 2014. The Complaint seeks foreclosure of the "Mortgage" and "Security Agreement" (as that term is defined in the Complaint).

2. Concurrently with this Motion for Entry of Judgment of Foreclosure and Sale, Plaintiff has requested that this Court enter a default order against Margrit Baba, Nella Baba, Unknown Owners and Nonrecord Claimants for its failure to defend or deny the allegations set forth in the Complaint. Plaintiff has also filed a motion for summary judgment against Albert Baba.

3. Plaintiff's claim for damages is for a sum that is made certain by computation and is more specifically set forth in Plaintiff's L.R. 56.1 Statement of Undisputed Facts, Exhibit C - Affidavit of Amounts Due and Owing, and expressly incorporated herein. [Pl. St., Exhibit C].

4. Plaintiff's attorneys' fees and court costs are more specifically set forth in Plaintiff's L.R. 56.1 Statement of Undisputed Facts, Exhibit D - Affidavit of Attorneys' Fees and Costs, and expressly incorporated herein. [Pl. St., Exhibit D].

5. Plaintiff's Loss Mitigation Affidavit is attached hereto as Exhibit A, and expressly incorporated herein.

6. Based on the foregoing, Plaintiff is entitled to a Judgment of Foreclosure and Sale as a matter of law.

Plaintiff, PHOENIX REO, LLC, as assignee of Phoenix NPL, LLC, assignee of the Federal Deposit Insurance Corporation, as Receiver for The National Republic Bank of Chicago, respectfully requests that this Honorable Court enter an order for Judgment of Foreclosure and Sale; and for such other and further relief this Honorable Court deems just and proper.

Respectfully submitted,
PHOENIX REO, LLC, as assignee of
Phoenix NPL, LLC, assignee of the Federal
Deposit Insurance Corporation, as Receiver
for The National Republic Bank of Chicago,

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By: /s/ Sandra A. Franco
One of its attorneys